

1 Robert Tauler (SBN 241964)  
robert@taulersmith.com  
2 Narain Kumar, Esq. (SBN 301533)  
nkumar@taulersmith.com  
3 TAULER SMITH LLP  
626 Wilshire Boulevard, Suite 550  
4 Los Angeles, California 90017  
Tel: (213) 927-9270

5  
6 *Attorneys for Plaintiff*  
*Courtney Mitchener*

7  
8  
9  
10 **UNITED STATES DISTRICT COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 COURTNEY MITCHENER  
13 individually and on behalf of all others  
similarly situated;

14 Plaintiff,

15 v.

16 TALKSPACE NETWORK LLC, a New  
17 York limited liability company; DOES 1  
through 25, inclusive

18 Defendant.  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No.: 2:24-cv-07067-JAK-BFM

**EXPERT DECLARATION OF  
ADAM WEISS IN SUPPORT OF  
PLAINTIFF COURTNEY  
MITCHENER'S OPPOSITION TO  
DEFENDANT TALKSPACE  
NETWORK LLC'S MOTION FOR  
SANCTIONS PURSUANT TO FED.  
R. CIV. P. 11**

Hearing

Date: April 21, 2025

Time: 8:30 am

Courtroom: 10C

**DECLARATION OF ADAM WEISS**

I, Adam Weiss, declare:

1. I graduated from University of Southern California in 2002, where I majored in Urban Planning. I also have a Masters degree from USC in Public Administration.

2. I am the President, CEO and Lead Web Developer at Great Matter, a company I founded 16 years ago. Great Matter specializes in designing, developing, hosting, and supporting web sites, marketing campaigns, and technical support. I have extensive experience in frontend and backend development, databases, and server infrastructure.

3. I was engaged to conduct a technical audit of the Talkspace.com website to evaluate its implementation of the TikTok Pixel tracking code and consent architecture.

4. Following my evaluation of the complaint, and a review of the website and publicly available APIs, the complaint's screenshot accurately depicts a pixel on the Talkspace website that references TikTok, and that the website no longer uses that specific pixel. The pixel can send form data captured from any page on the website and transmit it to TikTok, including name and phone number depending on the pixel's configuration.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. This declaration is executed on this 21<sup>st</sup> day of March, 2025, at Los Angeles, California.

DocuSigned by:

*Adam Weiss*

86C93A4A82864D8...

Adam Weiss